

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

DAVID GRIMALDI	:	CIVIL ACTION NO.
	:	
Plaintiff,	:	1:16-CV-00519-S-PAS
	:	
v.	:	
	:	
US BANK NATIONAL ASSOCIATION, AS	:	
TRUSTEE FOR LSF9 MASTER	:	
PARTICIPATION TRUST, ALIAS,	:	
CALIBER HOME LOANS, INC.,	:	
	:	
Defendants.	:	DECEMBER 19 , 2017

OBJECTION TO MOTION FOR EXTENSION OF TIME

Defendants U.S. Bank National Association, as Trustee for LSF9 Master Participation Trust (“U.S. Bank”) and Caliber Home Loans, Inc. (“Caliber,” and collectively the Defendants”), hereby object to David Grimaldi’s (“Plaintiff”) motion for an extension of time in which to respond to Defendants’ Renewed Motion for Summary Judgment (“Defendants’ Renewed Motion”). The Court should deny the motion for extension. As reasons therefore, Defendants state the following:

This is Plaintiff’s fourth request for an extension of time. Plaintiff’s request is unwarranted. Defendants filed for summary judgment November 18, 2016, more than a year ago. (Dkt. No. 5). The Court denied that motion without prejudice to refiling. Defendants filed their Renewed Motion on November 6, 2017 (Dkt. No. 16). Plaintiff has filed numerous motions for extensions of time to respond to Defendants’ Renewed Motion, which Plaintiff has been in possession of for several months. He is well aware of the issues involved in this matter and it is inconceivable that he needs more time to address them. Plaintiff only offers vague explanations for why he needs additional time, none of which warrants the continued delay.

For the foregoing reasons, Defendants respectfully request that the Court deny the most recent request for an yet another extension.

DEFENDANTS, U.S. BANK TRUST, N.A.,
AS TRUSTEE FOR LSF9 MASTER
PARTICIPATION TRUST and CALIBER
HOME LOANS, INC.,
By their attorney,

/s/ Joseph K. Scully

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CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing was sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's system.

Joseph K. Scully